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VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP
Letter Motion for Relief from Order re: Production of Tax Returns

Your Honor:

Prof. Dershowitz respectfully submits this letter motion seeking relief from Your Honor's February 14, 2022 Order (ECF No. 401) requiring the production of Prof. Dershowitz's tax returns.

Your Honor ordered Prof. Dershowitz to produce his tax returns on the grounds that they "are relevant to show economic loss, and there is a compelling need because the information is not otherwise obtainable." ECF No. 401 at 6. Prof. Dershowitz's returns are filed jointly with his wife, and she objects to their production. Accordingly, Prof. Dershowitz is prepared to waive, by stipulation, any claim for loss of income in order to be relieved from the Court's order requiring the production of his and his wife's joint tax returns.

Insofar as Plaintiff independently sought the returns as evidence of income that Prof. Dershowitz received from Jeffrey Epstein – although that is *not* a basis upon which the Court ordered them produced – our understanding is that the returns will not reflect any such payments as individual line items. Regardless, Prof. Dershowitz will agree to provide any IRS Form 1099s (either to Prof. Dershowitz individually or to Alan Dershowitz Consulting LLC) which reflect any income received from Epstein, thereby obviating any conceivable need for the returns themselves.

Prof. Dershowitz notified Plaintiff's counsel of this proposal by email yesterday. Plaintiff rejected the proposal, without explaining why the waiver of any claim for economic loss, coupled with the production of 1099s reflecting income from Epstein, moots the Court's order and obviates the need for the returns. It bears noting that Plaintiff was allowed to amend her complaint in order to avoid discovery; there is no reason why Prof. Dershowitz should not be allowed to do the same via the offered stipulation.

Respectfully submitted,

/s/ Christian G. Kiely
Christian G. Kiely

cc: All counsel of record, via ECF